

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PRESTON LAWLEY

Plaintiff

Case No. 2-11-cv-12822-LPZ-RSW

HON. LAWRENCE P. ZATKOFF
United States District Judge

Vs.

ALLAN JERRY SIEMONS

HON. R. STEVEN WHALEN
Magistrate Judge

Defendant

ABBOTT NICHOLSON P.C.

JOHN C. SCHULTES P33463

By: William D. Gilbride, Jr P36830

Attorney for Defendant

Heidi E. Warren (P69714)

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DEFENDANT'S EXHIBIT LIST

EXHIBIT NO.

DESCRIPTION

35 Personal Financial Statement of Jerry Siemons dated May 12, 1997

36 Letter dated August 21, 1997 to Preston Lawley from Jerry Siemons re: \$50,000 Loan

37 Letter to dated August 11, 1997 to William R. Fenton from Jerry Siemons

38A Letter to dated December 13, 1997 to Preston Lawley from Jerry Siemons

38B Proposed Corporate Structure Chart

39 Minutes of the First Meeting of the Board of Directors by Unanimous Consent
Dated January 27, 1998.

40A Letter dated March 28, 1998 to Broidy Capital regarding BMW contract financing

40B Re-Cap of March 1, 1998 meeting in Detroit regarding company issues

41 Letter dated June 4, 1999 to Elliott Broidy regarding Sports Capital Proposal

DEFENDANT'S EXHIBIT LIST CONTINUED

EXHIBIT NO.	DESCRIPTION
42	Letter dated March 19, 2000 to Ben Giovanelli from Jerry Siemons
43	Stock Purchase Proposal memorandum from Executive Committee of ESI dated 1/7/05
44	Letter dated July 7, 2003 from Robert Scapa, Esq, to William Gilbride, Esq.
45	Letter dated November 24, 2003 to Brad Beets from Alan J. Siemons re: Roth IRA payment for ESI Stock.

Dated: 1/17/2013

/S/ John C. Schultes
John C. Schultes
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CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2012, I electronically filed the foregoing witness list with the Clerk of the Court using the ECF system, which will send notification of such filing to the attorneys of record.

Dated: January 17, 2013

s/ John C. Schultes
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